

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARTIN JOHN STEVENS,

Plaintiff,

-against-

ALAN J. HANKE, IOLO GLOBAL LLC,
GUARANTEE INVESTMENT TRUST,
SHERRY SIMS, SIDNEY MILLS ROGERS
III, AMY ROY-HAEGER, and JOHN DOES
1-100,

Defendants.

Case No.: 20-cv-08181 (JPC)

Related Proceeding:
Case No.: 1:20-cv-4765 (JPC)

**NOTICE OF MOTION OF
PLAINTIFF STEVENS'
MOTION TO CONSOLIDATE
RELATED PROCEEDINGS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and the Declarations of David D. Holahan and Matthew A. Ducharme, executed on May 20, 2021, and the accompanying exhibits thereto, Plaintiff Martin John Stevens, joined by plaintiff in the related proceeding, *Mohammed Thani A.T. Al Thani v. Alan J. Hanke, IOLO Global LLC, et al.*, Case No.: 20-cv-4765 (JPC) (S.D.N.Y.) (the “Related Actions”), by and through his attorneys, Chelney Law Group PLLC, hereby moves this Court, before the Honorable John P. Cronan, United States District Judge, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, Courtroom 20C, New York, New York 10007, at a date and time to be directed by the Court, for an Order:

- (i) pursuant to Rules 42(a)(2) of the Federal Rules of Civil Procedure, consolidating the Related Actions; and
- (ii) granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the briefing schedule set by the Court on May 20, 2021, opposition papers must be filed on or before June 10, 2021, and reply papers must be filed on or before June 17, 2021.

Dated: New York, New York
May 20, 2021

Respectfully Submitted,
CHELNEY LAW GROUP PLLC

By: /s/David D. Holahan
Stan Chelney
David D. Holahan

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As ordered by the Court on May 19, 2021, Plaintiff must respond to Defendant S. Mills Rogers, III's pre-motion letter before briefing on the motion to consolidate will go forward. See Dkt. 75. Accordingly, briefing on Plaintiff's motion to consolidate is stayed pending further order of the Court. Plaintiff shall respond to Defendant Rogers's pre-motion letter by May 24, 2021.

SO ORDERED.

Date: May 20, 2021
New York, New York


JOHN P. CRONAN
United States District Judge

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